Verbal Comments from the American Water Works Association

SAB Hydraulic Fracturing Research Advisory Panel review of EPA's draft Assessment Report on Hydraulic Fracturing, October 28, 2015

AWWA applauds EPA's efforts in conducting this assessment and the efforts of the Science Advisory Board to review the study's material. AWWA also appreciates today's comment period as an additional opportunity share our concerns on the assessment, as provided officially and in more detail in our written comments dated August 28, 2015[1], and the comments included below are only a selection of the concerns described there. For those of you not familiar with AWWA, we are a an international, nonprofit, scientific and educational society dedicated to providing Total Water Solutions® assuring the effective management of water. Our membership includes approximately 4,000 drinking water, wastewater, storm water, and water reuse utilities and a total of 50,000 water professionals.

Rare impacts are relevant and should be fully described

EPA asserts that the evidence of impacts of hydraulic fracturing on drinking water resources is "not widespread of systemic." However, even very rare impacts are significant when and where they occur, and technical and policy discussions to further reduce both the incidence and consequence of rare impacts is still extremely important to drinking water resources. Protection of drinking water requires a very long view – looking at least 10, 20, or even more years into the future. We recommend that EPA provide more analysis of the consequence of rare events. For example, we believe EPA should better characterize, or at least clearly list as a research need, the fate of well casings over time, issues surrounding proper and improper well abandonment, and storm water and water quality impacts of these activities in routine operations.

Injection-related issues should be addressed for future assessments

EPA's study plan did not include an analysis of impacts of wastewater injection through the Underground Injection control program. Impacts, if any, remain unclear, and we recommend that EPA pursue research on this topic and clearly identify it as a research gap in this assessment.

Seismic impacts should be addressed for future assessments

EPA's study plan for this assessment did not include an analysis of potential induced seismicity, from fracturing itself or from wastewater disposal through injection. Evidence of the potential for induced seismicity continues to mount and could impact water resources such as aqueducts and treatment facilities. We encourage EPA to prioritize this research and identify it as a gap in this assessment.

Exploration of tracers should be addressed for future assessments

Many groups have discussed the potential for unique "tracer" or "fingerprint" substances that could be easily distinguished from naturally occurring substances as an "early warning" for potential contamination events. The feasibility of such systems remain unclear, and we believe that assessing the feasibility and potential usefulness of such a system is worth exploring, and doing so should be identified as a research gap for future work.

Thank you for the opportunity to provide these comments.

---

[1] AWWA's official written comments can be accessed on the EPA-HQ-OA-2015-0245 docket at http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OA-2015-0245-0156.